

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK**

MOOG INC.,

Plaintiff,

v.

SKYRYSE, INC., ROBERT ALIN PILKINGTON,
MISOOK KIM, and DOES NOS. 1-50,

Defendants.

Case No. 1:22-cv-00187-LVJ-JJM

**NOTICE OF DEFENDANT SKYRYSE'S MOTION TO DISMISS OR,
ALTERNATIVELY, TO TRANSFER VENUE**

Please take notice that Defendant Skyryse, Inc. ("Skyryse") respectfully requests that Moog's Complaint be dismissed, or in the alternative, the Court transfer this action to the United States District Court for the Central District of California. Dismissal is warranted under Federal Rule of Civil Procedure 12(b)(2), and also under Federal Rule of Civil Procedure 12(b)(3). In the alternative, this case should be transferred to the Central District of California pursuant to 28 U.S.C. § 1404. Pursuant to Local Rule 7(a)(1), Skyryse intends to file reply papers in support of this motion.

In support of this motion, we submit the following documents:

1. Memorandum of Law in Support of Defendant Skyryse's Motion to Dismiss or, Alternatively, to Transfer Venue;
2. Declaration of Katherine Dominguez and Attached Exhibits in Support of Defendant Skyryse's Motion to Dismiss or, Alternatively, to Transfer Venue; and
3. Declaration of Gonzalo Rey in Support of Defendant Skyryse's Motion to Dismiss or, Alternatively, to Transfer Venue.

Dated: March 29, 2022

/s/ Terrance P. Flynn

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